United States Environmental Protection Agency
Region 5
Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604

DATE: JUL 2 2 2014

SUBJECT: Inspection of Sunoco Marketing & Terminals L.P.
Cleveland, Ohio

FROM: Gregory Gehrig, Environmental Engineer
Air Enforcement and Compliance Assurance Section (WI/MI)

THRU: Sarah Marshall, Chief SM
Air Enforcement and Compliance Assurance Section (WI/MI)

TO: File

Facility:	Sunoco Marketing & Terminals L.P. Cleveland Terminal
Location:	3200 Independence Road, Cleveland, Ohio
Inspection Date:	July 2, 2014
Inspection Team:	Gina Harrison, Environmental Engineer, EPA Region 5 Gregory Gehrig, Environmental Engineer, EPA Region 5
Facility Attendees:	Curtis Bloxson, Terminal Operator, Sunoco Marketing & Terminals L.P. Cleveland Terminal John Musial, Terminal Operator, Sunoco Marketing & Terminals L.P. Cleveland Terminal Robert Falconbery, Area Terminal Manager, Sunoco Marketing & Terminals L.P.

Purpose of the Inspection:

To investigate, inspect, and determine whether Sunoco Marketing & Terminals L.P. Cleveland Terminal (Sunoco) is in compliance with the Ohio State Implementation Plan (SIP) and the Federal Clean Air Act (CAA). This includes interviewing Sunoco personnel and a facility tour.

Environmental Justice:

Per EJSCREEN, this facility is not in an EJ area of concern.

Overview of Company:

Sunoco is a liquid petroleum product storage and dispensing facility. The facility operates 24 hour per day, 7 days per week.

Opening Conference:

Gina Harrison and Greg Gehrig (EPA Inspectors) arrived at Sunoco at approximately 1:30 pm on July 2, 201. EPA Inspectors were greeted by John Musial and Curtis Bloxson at the facility office. After presenting credentials, the EPA Inspectors explained the purpose of our visit.

The opening conference was attended by Mr. Musial and Mr. Bloxson. During the opening conference the EPA Inspectors stated this was an unannounced inspection and that questions would be asked about the facility's processes and a tour of tanks and loading racks would be incorporated into the inspection. A review of the facility's processes was requested so the EPA Inspectors could understand the Sunoco petroleum storage and dispensing operations.

Facility Operations:

Sunoco has two fuel loading racks, 10 aboveground storage tanks (tanks) and vapor recovery unit (VRU). Products at the facility include gasoline, low sulfur diesel fuel (LSDF), ethanol, transmix and jet fuel. One loading rack dispenses primarily gasoline, while the other loading rack dispenses all other products. The facility operates 24 hour per day, 7 days per week. The facility offloads products from a pipeline into tanks. Products are then temporarily stored in tanks until they are dispensed into tank wagons.

Facility Tour:

After the overview of Sunoco's process, EPA Inspectors requested a tour of the facility. The tour began at approximately 2:20 pm. Mr. Musial and Mr. Bloxson represented Sunoco on the tour. EPA Inspectors used a FLIR gas-imaging camera and a photo-ionization detector (PID) during the tour to detect any leaks or emissions of volatile organic compounds (VOCs) from Sunoco's tanks and loading racks. Observations of tanks and loading racks are detailed in the table below.

Tank (OEPA ID/ Sunoco ID)	Product Stored	Capacity (gallons)	Observations
T001/ #1	Gasoline	1,901,928	Significant VOC gas flow from various structures atop tank (No PID readings). FLIR files 645 through 650.
T003/ #4	Out of service	513,030	NA
T004/ #36	Gasoline	825,499	Slight VOC gas flow from manway at base (14 ppm), and top of tank (no PID readings). FLIR file 651.
T005/ #52	Gasoline	1,201,105	No VOC gas flow.
T006/ #57	Ethanol	813,604	No VOC gas flow.
T008/ #62	Ultra Low Sulfur Diesel	1,050,000	No VOC gas flow.

	(ULSD)		
T010/ #63	Jet Fuel	996,660	Significant VOC gas flow from vent atop tanks (350 ppm). FLIR files 653 and 654.
T011/ #64	Jet Fuel	996,660	Significant VOC gas flow from vent atop tanks (1,300 ppm). FLIR files 655 and DC_656.
T043/ #61	ULSD	1,458,040	No VOC gas flow.
NA/#67	Transmix	unknown	Tank is not in permit.

Loading Rack (OEPA ID/ Sunoco ID)	**Products Dispensed**	**Observations**
J001/ Gasoline Loading Rack	Gasoline (blended with ethanol)	No VOC gas flow
J002/ Distillate Loading Rack	Jet Fuel, ULSD	No VOC gas flow

EPA personnel also observed the VRU. There was no indication from the PID or FLIR of VOC leaks or emissions.

Transmix is dispensed in a separate loading rack that is not permitted. There was no indication from the PID or FLIR of VOC leaks or emissions.

PID Calibration

The PID was calibrated prior to inspection activities at the EPA Chicago office on June 30, 2014. The PID was also zeroed inside the facility office prior to inspection and after the inspection of Tank T011/ #64.

Tour Follow-up and Closing Conference:

The closing conference was conducted at approximately 4:40 pm. John Falconbery represented Sunoco at the closing conference. EPA reviewed American Petroleum Institute (API) Protocol 653 in service inspection reports for tanks 1, 63 and 64 were reviewed. We informed Mr. Falconbery that the facility's Title V permit was incorrect regarding the presences of two IFRs, which the permit indicates are present on tanks T010 and T011, but facility personnel indicated they are not. Mr. Falconbery indicated that he would inform Sunoco's environmental manager to resolve this issue.

Sunoco indicated that all of the information discussed and materials obtained needed to be treated as confidential business information. Sunoco was informed that a CAA Section 114 Information Request may be sent to the facility.

Records Obtained:

1. Site figure
2. FLIR gas imaging recordings, files 645 to 655 and DC_646